

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
PECOS DIVISION

SERGIO TIJERINA-SALAZAR,

Plaintiff,

V.

FERMIN VENEGAS, III,  
FERMIN VENEGAS SHEARING, INC.,  
VENEGAS CONTRACTORS, INC., and  
GENESIS VENEGAS SALMON,

Defendants.

No. 4:19-cv-00074-DC-DF

## CERTIFICATE OF WRITTEN DISCOVERY

I hereby certify the following discovery responses were served on all parties of record, by  
and through their attorneys of record, via email:

1. Subject to and without waiving Defendant Genesis Venegas Salmon's Motion to Dismiss Plaintiff's Second Amended Complaint, Defendant Genesis Venegas Salmon's Objections and Responses to Plaintiff's First Set of Requests for Admission;
2. Subject to and without waiving Defendant Genesis Venegas Salmon's Motion to Dismiss Plaintiff's Second Amended Complaint, Defendant Genesis Venegas Salmon's Objections and Answers to Plaintiff's First Set of Interrogatories; and
3. Subject to and without waiving Defendant Genesis Venegas Salmon's Motion to Dismiss Plaintiff's Second Amended Complaint, Defendant Genesis Venegas Salmon's Objections and Responses to Plaintiff's First Set of Requests for Production with responsive document production Bates numbered SALMON1-SALMON43.

DATED: July 28, 2021

Respectfully submitted,

**MOUNCE, GREEN, MYERS,  
SAFI, PAXSON & GALATZAN**  
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By: \_\_\_\_\_

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Attorneys for Defendant Genesis  
Venegas Salmon

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was served on the following persons as indicated below on this 28<sup>th</sup> day of July, 2021.

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Christopher Willett, Esq. Equal Justice Center 510 Congress Ave., Ste. 206 Austin, Texas 78704 (512) 474-0008 Fax <a href="mailto:cwillett@equaljusticecenter.org">cwillett@equaljusticecenter.org</a> Attorneys for Plaintiff	<input checked="" type="checkbox"/> Electronic Service <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email
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**Michelle D. Esparza**